UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL
CLEANUP

August 28, 2018

MEMORANDUM

SUBJECT: Action Memorandum for an Emergency Removal Action, Burley Demolition Asbestos Site, Burley, Cassia County, Idaho

FROM: Stephen Ball, On-Scene Coordinator
Spill Prevention and Removal Unit
Emergency Management Program

THRU: Beth Sheldrake, Unit Manager
Emergency Response Unit
Emergency Management Program

Calvin Terada, Program Manager
Emergency Management Program

TO: Sheryl Bilbrey, Director
Office of Environmental Cleanup

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of an emergency removal action described herein for the Burley Demolition Asbestos Site in Burley, Cassia County, Idaho (Site). The proposed removal action is expected to be a U.S. Environmental Protection Agency (EPA) lead action in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

The scope of this removal action addresses the uncontrolled release of asbestos to the environment where found on-Site, to include a debris pile resulting from the demolition of two buildings.

II. Site Information

A. Site Description

Site Name:	Burley Demolition Asbestos
Superfund Site ID (SSID):	10QX
NRC Case Number:	None
CERCLIS Number:	IDN001010096
Site Location:	1222 and 1226 Overland Ave Burley, ID
Lat/Long:	42.5375517, -113.7936680

Potentially Responsible Party:	(PRP) Brian Tibbets/Diconia LLC.
Access:	By AOC
NPL Status:	Not proposed as an NPL site
Removal Start Date:	August 16, 2018

1. Removal site evaluation

On the morning of January 30, 2018, a fire occurred at two adjacent buildings in downtown Burley, Idaho. On or about February 17, 2018, the two buildings were demolished by a demolition contractor named Curb A Peal LLC, working for Brian Tibbets of Diconia LLC (Diconia), the owner of the properties. EPA's Office of Compliance and Enforcement (OCE) National Emission Standards for Hazardous Air Pollutants (NESHAP) inspector received a complaint on February 20, 2018 regarding potential asbestos in the demolished buildings.[1] The NESHAP inspector noted that required NESHAP approvals were not obtained prior to demolition. For an asbestos demolition project of this size, it is necessary to follow the NESHAP requirements at 40 C.F.R. § 61.145. On February 21, 2018, the EPA NESHAP inspector spoke to a contractor who had bid on the demolition job. The contractor stated he walked through the buildings and saw popcorn ceiling, Thermal System Insulation (TSI) around piping, and mastic on the floor. These materials are typically expected to contain asbestos. It was also reported that eight truck-loads of material were hauled by Curb A Peal LLC from the Site to a gravel pit several miles south of Burley.[2]

Mr. Tibbets then collected samples of wood, metal, and brick from the demolition debris pile to analyze these materials for asbestos, and seemingly satisfy requirements for disposal of the debris. The sample results were negative for asbestos, which is expected as these types of materials are not likely to contain asbestos. Adequate characterization is required to ensure proper handling of material, to accurately represent the waste being shipped to the disposal facility, and to determine if the material should be placed in a special asbestos "cell" within the disposal facility. An appropriate characterization of other materials in the debris that may contain asbestos was not performed by the owner. As a result, the EPA NESHAP inspector asked the owner for additional samples to be collected from the debris by a qualified asbestos contractor.

On March 2, 2018, the EPA NESHAP inspector began urging the owner to also initiate stabilization measures at the Site due to the threat of release of asbestos. On March 13, 2018, after the owner had not produced any additional sample results and had not initiated stabilization measures, the EPA NESHAP inspector traveled to the demolition site, obtained verbal access from the owner, and collected 12 samples of materials from the debris. Five additional samples were collected at the off-site gravel pit where the eight truck-loads of material from the Site were disposed. An EPA On-Scene Coordinator (OSC) and two Idaho Department of Environmental Quality (IDEQ) employees were also in attendance during the sampling event. The EPA sampling results from the demolition area at the Site indicated one sample of 4% asbestos in roofing material and one sample of >1% asbestos in roofing material. Because the building

[1] **Pavitt, *Conversation Record: Asbestos NESHAP Complaint, Burley, ID*, 08/14/2018**
[2] **Pavitt, *Conversation Record*, 08/14/2018**

demolition material had been pushed into a former basement structure on site, health and safety concerns made collection of representative samples of all material very challenging.

The EPA NESHAP inspector notified the property owner on March 19, 2018, that sample results indicated the property was contaminated with asbestos and EPA would need assurances that the property would be handled in accordance with NESHAP requirements. The EPA NESHAP inspector sent a follow-up email to the property owner on March 21, 2018, stating that NESHAP regulations require the owner to keep the asbestos waste material wet until an asbestos certified contractor could arrange for proper disposal.

After the EPA sampling event was completed, it was revealed that a local asbestos abatement company had, in fact, been hired by the demolition contractor representative (presumably acting on behalf of the property owner), to sample the debris at the property. The samples were collected on March 7, 2018, but results were not provided to the EPA until March 20, 2018. The results indicated one sample containing 50% asbestos in roofing material as well as two samples containing 6% asbestos in spray-on texture.

On March 21, 2018, after review of analytical results of the samples collected on March 7 as well as EPA's sample results, the OSC determined a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was necessary. The OSC immediately contacted the owner of the property and directed him to fence the property, add asbestos signage to the fence, and apply water to the debris pile to reduce fugitive dust emissions by no later than March 23, 2018. The owner indicated he could perform the actions and committed to completing the actions no later than March 23, 2018. On March 22, 2018, EPA issued a general notice letter to the property owner informing the owner of its responsibility and liability under CERCLA.[3]

After inspection of the Site by the OSC on March 23, 2018, the OSC identified that asbestos signs were still needed and a gap in the fence needed to be closed. The owner was given an additional week to complete these actions and EPA confirmed the necessary temporary mitigation measures were in place by March 29, 2018.

After initial stabilization measures were complete, the EPA continued discussions with Mr. Tibbets in order to provide the owner with an opportunity to conduct a proper clean-up of the Site. The EPA explained that all debris must be handled as asbestos-contaminated material since sample results indicated asbestos contamination was comingled with the debris. The EPA also indicated that there needed to be trained workers to handle the debris during clean-up operations, dust suppression operations to prevent airborne asbestos during the clean-up, and disposal of the debris at a facility licensed to accept asbestos contaminated waste. Mr. Tibbets initially indicated that the owner was not able to afford such a clean-up and EPA began planning to conduct the clean up as an EPA-lead project. However, on May 17, 2018, while EPA was attempting to gain

[3] **Sheldrake, *General Notice Letter for the Burley Demolition Asbestos Site in Burley, Idaho*, March 22, 2018**

voluntary access to conduct additional assessment activities, Mr. Tibbets stated that he believed that he could leverage the proceeds of the sale of the property to fund and conduct a clean-up and requested 60 days to prepare and begin to execute this plan. The EPA granted that request, but after several contractors indicated to Mr. Tibbets that the cost would be much higher than his budget of $35,500, he again stated to EPA on July 9, 2018, that the owner would not be able to finance a proper clean-up.

On August 10, 2018, in response to notification from the Cassia County Sheriff's Office that water was not being applied to debris at the Site, EPA conducted an unannounced visit to the Site. From the boundary of the Site, EPA observed that water was not being applied to the debris at the Site, that the debris piled appeared completely dry, and that it was unclear if or when water had been applied to the Site. Based on the Site conditions, and the failure to adequately wet the asbestos-containing material in the debris pile at the Site resulting in an imminent threat to human health, an emergency removal action was determined to be necessary. A Unilateral Administrative Order was issued to the property owner on August 14, 2018, to gain access and EPA contractors were activated and mobilized to the Site to begin work on August 17, 2018.

2. Physical location:

The Site is located on the west side of Overland Avenue near its intersection with Main Street, in Burley, Cassia County, Idaho (Figure 1). The latitude is 42.5375517 north and the longitude is 113.7936680 west. The population of Burley was approximately 10,500 in 2016. Land use surrounding the Site consists of mixed commercial, industrial, and residential development.

The Site occupies a single parcel (APN: RPBB001120026A) of property approximately 0.15 acres in size, and is in the central area of downtown Burley. Bordering to the east of the property is Overland Avenue and several commercial shops, including American Family Insurance and Jensen Jewelers. To the south are several more commercial shops, including Trish's Wedding and More. Immediately to the west of the property is an alleyway as well as additional commercial shops, including Premier Dancewear and Thomas Photography. A real estate group and attorney's offices are located directly north of the Site in the old bank building.

3. Site characteristics

The Site historically consisted of two buildings with a shared wall. These buildings have been vacant for some time, but at one time one building was believed to be operated as a hotel and the other reportedly as a theater. Both buildings reportedly had approximately 9- to10-foot deep basements. The buildings were purchased by the current owner in October 2017 with the intent of using the property to create additional parking for the City. On January 30, 2018, a fire occurred in the two buildings, which later resulted in an arson investigation. On or around February 17, 2018, the buildings were demolished in place leaving the debris mostly in the basement area of the two buildings. The Site has no vegetation and is located in an urban setting of Burley, Idaho. The topography is flat. Access to the Site has been restricted using temporary fencing as directed by the OSC.

4. Release or threatened release into the environment of a hazardous substance or pollutant or contaminant

The contaminant of concern for this action is asbestos. Asbestos is a hazardous substance as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. § 9601(14).

The fire and subsequent demolition of the burned buildings has resulted in the release of asbestos-containing material (ACM) at the Site and this material continues to be exposed to the elements, including cold winters, hot summers, and high wind speeds. Temperatures in the Burley area can range from 105 degrees Fahrenheit in summer to as low as -30 degrees Fahrenheit in the winter. (www.intellicast.com) These extreme weather conditions and annual cycles of freezing and thawing, coupled with high wind speeds and little precipitation, will likely continue to degrade the ACM and cause future uncontrolled releases of asbestos fibers to the environment.

Data regarding the nature and extent of asbestos known or suspected to be present at the Site are summarized above in Section II.A.1. It is estimated that as much as 5,500 square feet of asbestos containing roofing material is mixed within an estimated 2,000 cubic yards of debris. It is also anticipated, based on an eye witness account, that unknown quantities of popcorn ceiling, TSI on piping, as well as mastic on the floor (all which may contain asbestos) are also mixed in the debris pile. Approximately 1,280 square feet of spray on wall texture, potentially containing asbestos, has been exposed and damaged due to the demolition and now continues to degrade with exposure to the elements. Although efforts by the property owner to restrict access and wet the material provide some level of short term stabilization, they have been shown to not be sustainable in the long term and will not fully protect human health and the environment from potential future releases of asbestos from the site.

5. NPL Status

The Site has not been proposed for the National Priority List (NPL) nor is it expected to be referred to the NPL assessment program.

6. Maps, pictures, and other graphic representations

Figure 1 is a location map and Figure 2 is a site features map.

A. <u>Other Actions to Date</u>

1. Current Actions

The property owner has implemented temporary stabilization measures at the Site. As directed by the OSC, the property owner has placed temporary fencing around the property and warning signs on the fencing. The property owner is applying water to the property via two sprinkler heads, but an inspection on August 10

2018, showed that ineffective in ensuring the demolition material remains wet to minimize the potential for asbestos to be released from the Site.

B. State, Local and Tribal Authorities' Roles

1. State, local, and tribal actions to date

State and local authorities, including the IDEQ and the City of Burley, are aware of the Site and the threats posed by asbestos and are supportive of a cleanup action to address the asbestos-contaminated debris. IDEQ personnel participated in the EPA sampling event that took place on March 13, 2018. No other actions have been taken by IDEQ or the City of Burley, however coordination continues between these two entities and EPA.

2 Potential for continued State and Local response

The EPA will continue to work with State and local authorities to ensure that they are aware of Site clean-up activities. State and local authorities do not intend to take an action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

The current conditions at the Site meet the following factors which indicate that the Site is a threat to the public health or welfare or the environment and a removal action is appropriate under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

1. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)]

Elevated concentrations of the asbestos minerals tremolite and chrysotile have been detected in approximately 1,280 square feet of spray-on texture on the shared south wall. The entire wall is still standing (supporting the adjacent building) and exposed to the elements. Signs of deterioration, including gashes and scrapes are present on this material. Approximately 5,500 square feet of roofing material, which contains elevated concentrations of chrysotile asbestos, is comingled with other building debris due to the demolition. However, much of the roofing material is visible on the surface of the Site and exposed to the elements. The roofing material and spray-on texture has been classified as friable by an EPA NESHAP inspector, as well as the asbestos abatement company that sampled the material. In addition, a contractor who did a walk-through of the buildings prior to demolition, reported seeing popcorn ceiling, TSI on piping, as well as mastic on the floor. These materials are not visible on the surface of the debris, but are nonetheless believed to be present within the debris pile. Asbestos fibers in the environment may lead to human exposure by several pathways. For nearby residents, visitors, trespassers, or workers, the likely pathways include inhalation of ambient air and direct handling of ACM. In both scenarios ACM is disturbed by weather and/or by people, which causes asbestos fibers to become airborne, thus creating the inhalation hazard.

There is no known safe level or period of exposure for asbestos. When sources of asbestos are widespread in an area, exposures may occur from releases caused by wind or mechanical forces from many different locations, all of which may add to the level of asbestos that is present in ambient air. Thus, simply breathing outdoor air, even in the absence of activity disturbing any ACM, might lead to asbestos exposure. Additionally, exposures may occur if pieces of ACM are picked up and handled, releasing fibers of asbestos to air which can be inhaled. Fibers may also adhere to the skin or clothing, which could result in inhalation exposure if the fibers were subsequently released to ambient or indoor air. Continued exposure can increase the amount of fibers that remain in the lungs. Fibers embedded in lung tissue over time may cause lung diseases, including asbestosis, lung cancer, mesothelioma, or pleural abnormalities[4].

The Site is located in the downtown core of Burley, Idaho, population approximately 10,500, and is directly adjacent to several commercial businesses. A public sidewalk and alleyway also directly border the property. The location of this site and the condition of the asbestos contaminated demolition debris directly contribute to the actual or potential exposure to nearby human populations.

2. **High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate [300.415(b)(2)(iv)]**

   Much of the ACM at the Site is located on the surface of the debris pile, where it is susceptible to continued breakdown from weathering and/or mechanical forces, which has and will continue to result in the uncontrolled release of asbestos fibers from the ACM to the environment. Samples of roofing material contained chrysotile at concentrations up to 50%. The former roof had an estimated area of 5,500 square feet and now the ACM is comingled within the building debris. Up to 6% tremolite and chrysotile asbestos were detected in approximately 1,280 square feet of spray-on texture. Future construction or property development activities may also further expose and damage ACM, which will further their susceptibility to breakdown from weathering and/or mechanical forces and will further exacerbate this uncontrolled release of asbestos fibers to the environment.

3. **Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or to be released [300.415(b)(2)(v)]**

   The Site is exposed to rain, snow, wind, and water runoff. The cumulative effect of these weather-related phenomena will likely cause pieces of ACM to undergo further breakdown and/or migration off-Site resulting in additional future uncontrolled releases of asbestos fibers to the environment. The City of Burley is in an arid environment with frequent gusty and high-sustained winds. As previously noted, temperatures in the Burley area can range from 105 degrees Fahrenheit in summer to as low as -30 degrees Fahrenheit in the winter. (www.intellicast.com) These extreme weather conditions and annual cycles of freezing and

[4] **https://www.atsdr.cdc/gov/asbestos/health_effects_asbestos.html**

thawing, coupled with high wind speeds and little precipitation, will likely continue to degrade the ACM and cause future uncontrolled releases of asbestos fibers to the environment.

4. **The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)]**

   No other federal or state agency has the capacity or willingness to perform the removal action in a timely manner.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site may present an imminent and substantial endangerment to the public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

Removal of ACM and presumed asbestos-containing material (PACM):

Personnel will remove all ACM and PACM located within the Site by using heavy machinery and/or hand methods appropriate for the type of material (e.g., roofing material, spray-on wall texture, building materials, etc.). The primary source of asbestos is roofing materials and spray-on wall texture that is attached to a shared wall that is still standing as well as comingled with demolition debris and openly exposed to the environment. There may be other sources such as TSI wrap on piping and mastic in flooring. ACM will be kept adequately wet utilizing water or equivalent as needed. Air monitoring and best management practices will be utilized to ensure that workers and the public are not exposed to asbestos fibers. ACM and PACM will be appropriately packaged and these materials will be transported off-site for disposal at a landfill authorized to accept asbestos waste in compliance with the Off-Site Rule, 40 C.F.R. § 300.440, to the extent practicable considering the exigencies of the situation.

Due to the nature of the demolition of the buildings without the prior performance of a proper asbestos abatement, the entire debris pile is considered contaminated with asbestos. It is estimated that there are 2,000 cubic yards of contaminated material on the Site. This volume is estimated assuming a 10-foot deep basement filled with debris. There may be voids in the debris and other factors that impact the amount of contaminated material. Segregation is not anticipated to be efficient or effective due to the nature of the Site debris; however, if during the course of the removal action, segregation efficiencies can be realized, they will be implemented. During the removal action, an AHERA-certified asbestos building inspector will be present on Site to monitor the progress of the removal action and to inspect cleaned areas of the Site for any residual ACM or PACM. After removing ACM from the Site, the surface will be vacuumed using

an appropriate method to contain any residual asbestos. Finally, activity-based sampling will be conducted to confirm that no further action is needed.

As a result of this removal action, there should be no remaining ACM or PACM at the Site and, therefore, there should be no need for post-removal site controls or institutional controls.

Construction Best Management Practices:

Appropriate and practicable construction Best Management Practices (BMPs) will be implemented during cleanup activities to protect workers, the community, and the environment from short-term construction impacts. A water truck will be used on-site to spray water on any ACM debris being handled or removed to minimize the generation of airborne dust. The handling and removal of ACM will be performed by a certified asbestos abatement contractor with AHERA-certified asbestos supervisor and workers. Site workers will wear appropriate personal protective equipment, including respirators. Personal and stationary air sampling will be performed to ensure that the work is performed in a manner that does not expose Site workers or the public to asbestos.

2. Contribution to remedial performance

The proposed action is designed to be the first and only action for the Site.

3. Engineering Evaluation/Cost Analysis

An Engineering Evaluation/Cost Analysis is not required because this removal action is a time-critical action.

4. Applicable or relevant and appropriate requirements

The NCP requires that removal actions attain Applicable or Relevant and Appropriate Requirements (ARARs) under federal or state environment or facility siting laws, to the extent practicable (40 C.F.R. § 300.415(j)). In determining whether compliance with ARARs is practicable, the EPA may consider the scope of the removal action and the urgency of the situation (40 C.F.R. § 415(j)). Given the time-critical nature of the proposed removal action, EPA has not requested a list of ARARs from the State, but will continue to coordinate with the State as planned for the duration of the removal action. Based on experience working in the State of Idaho on similar asbestos sites, EPA developed the following list of ARARs.

Federal ARARs

Section 112 of the Clean Air Act, 42 U.S.C. § 7412, National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 C.F.R. Part 61, Subpart M. Subpart M addresses asbestos milling, manufacturing, and fabricating operations, demolition and renovation activities, waste disposal issues, active and inactive waste disposal sites, and asbestos

conversion processes. Subpart M is potentially applicable to the notification, handling, packaging, labeling, transportation, and disposal of asbestos-containing material. Specifically, the Subpart M regulations that are potentially applicable to this action are 40 C.F.R. § 61.145, Asbestos Emissions Standards for Demolition and Renovation; 40 C.F.R. § 61.150, Standards for Waste Disposal from Demolition and Renovation; and 40 C.F.R. § 61.154, Standards for Active ACM Waste Disposal Sites.

National Historic Preservation Act, 16 U.S.C. § 470; 36 C.F.R. Part 800. The National Historic Preservation Act (NHPA) and implementing regulations require federal agencies to consider the possible effects on historic sites or structures of any actions proposed for federal funding or approval. Historic sites or structures are those included on or eligible for the National Register of Historic Places (NRHP), generally older than 50 years. If an agency finds a potential adverse effect on historic sites or structures, such agency must evaluate alternatives to "avoid, minimize, or mitigate" the impact, in consultation with the State Historic Preservation Office (SHPO) and/or Tribal Historic Preservation Officer (THPO).

Endangered Species Act, 16 U.S.C. § 1536. The Endangered Species Act (ESA) requires that each federal agency ensure, through consultation, that any action authorized, funded, or carried out by that agency is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of critical habitat for endangered or threatened species.

State

EPA discussed potential State ARARs with IDEQ and they indicated there are no State-specific ARARs for this action.

5. Project schedule

Removal activities are expected to begin as quickly as possible and are to be completed during the late summer of 2018. It is expected that project implementation will take approximately 30 days to complete.

B. **Estimated Costs ***

Extramural Costs **ERRS**	**$ 570,000**
Other Extramural Costs not funded from the Regional Removal Allowance **START**	**$ 200,000**
Subtotal	**$ 770,000**
Cost Contingency 10%	**$ 77,000**
Total Removal Projected costs	**$847,000**

* EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at the Site would increase the actual or potential threats to the public health, or welfare, or the environment. If the asbestos material is not removed, there is a high potential for the material to become airborne or otherwise migrate off the Site causing a direct threat to the community.

VII. OUTSTANDING POLICY ISSUES

A removal action involving asbestos as the principal contaminant of concern is one of seven designated nationally significant or precedent-setting (NSPS) categories (see Office of Emergency Management, Superfund Removal Guidance for Preparing Action Memoranda, September 2009). In this case asbestos is not naturally occurring and has been released into the environment as a result of an improper building demolition. EPA Region 10 is not selecting an asbestos removal action level however all debris that is comingled with ACM will be removed from the site for disposal. In the case of an emergency action such as this, Region may initiate emergency actions necessary to mitigate or stabilize the site without formal EPA HQ concurrence. Coordination has been conducted with EPA Headquarters via email and telephone

calls and a copy of the signed action memo will be provided to EPA Headquarters per the Emergency Removal Concurrence Procedures.

VIII. ENFORCEMENT

Refer to the attached confidential enforcement addendum.

IX. RECOMMENDATION

This decision document represents the selected emergency removal action for the Burley Demolition Asbestos Site in Burley, Cassia County, Idaho developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision document is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal and I recommend your approval of the proposed emergency removal action. The total project ceiling, if approved, will be $847,000.

Attachments

Attachment A: Enforcement Addendum- Enforcement Confidential

Approve: X

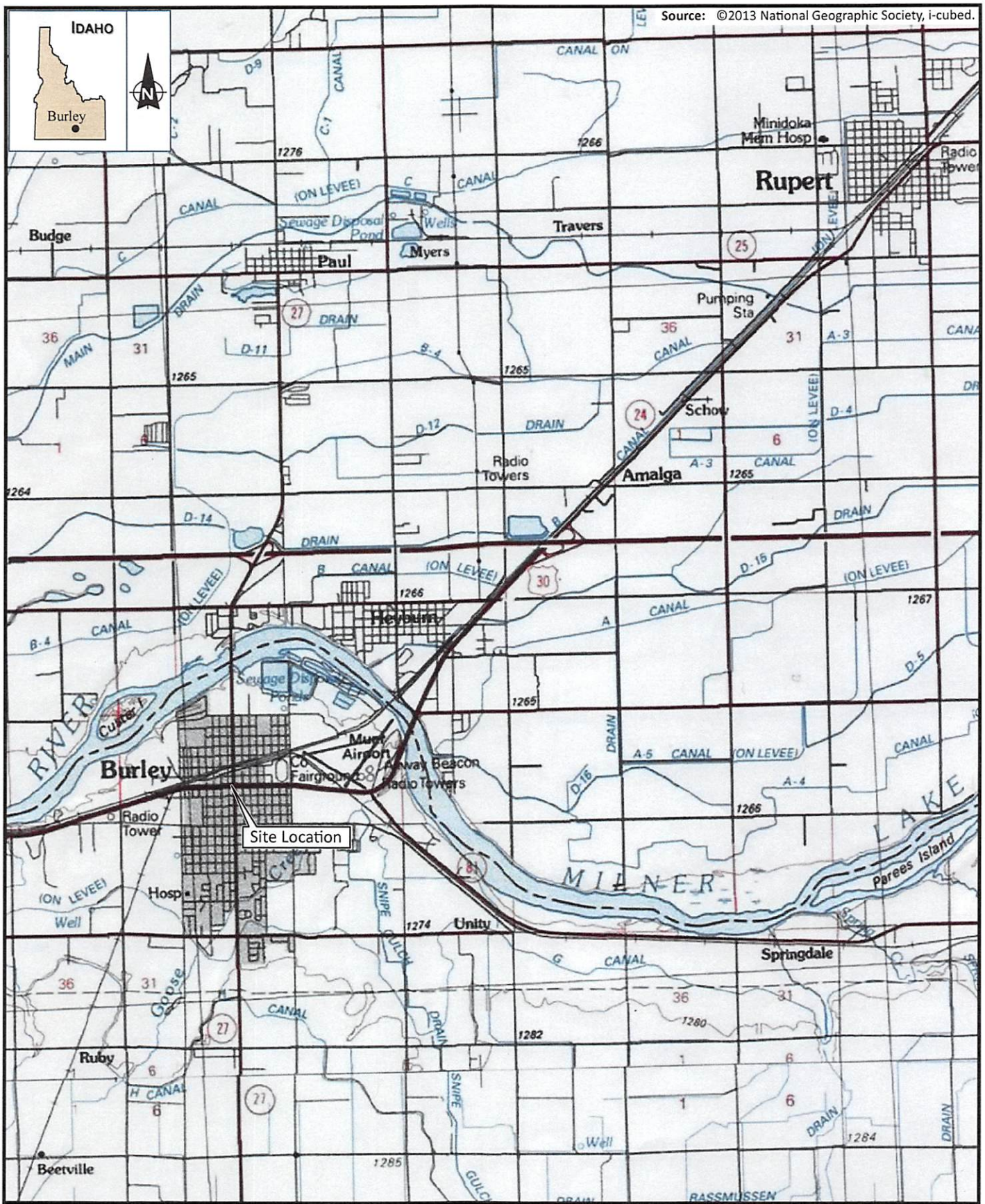
for

Sheryl Bilbrey, Director
Office of Environmental Cleanup

Disapprove: _____

_____

Sheryl Bilbrey, Director
Office of Environmental Cleanup



ecology and environment, inc. Global Environmental Specialists Seattle, Washington	BURLEY DEMOLITION ASBESTOS SITE Burley, Idaho	Figure 1 SITE LOCATION MAP
	0 1 2 Approximate Scale in Miles	Date: 5/9/18 | Drawn by: AES | 10:START-IV\TO68HR0718F037\fig 1

ecology and environment, inc. Global Environmental Specialists Seattle, Washington	BURLEY DEMOLITION ASBESTOS SITE Burley, Idaho	Figure 2 SITE LAYOUT MAP		
	0 100 200 Approximate Scale in Feet	Date: 5/16/18	Drawn by: AES	10:START-IV\ TO68HR0718F037\fig 2

Burley Demolition Asbestos Site
Enforcement Addendum
Privileged

(b) (5)

[redacted]

Action Memorandum Check Sheet[1]

Coordination with or obtained:	Y/N	Contact Info or Comment:
Acct No. obtained	Y	
CERCLIS No. obtained	Y	
ATSDR coordination	N	Idaho Public Health supporting EPA fact sheet with community questions.
Community Involvement/Press coordination	Y	
Contracts (ERRS, START)	Y	
Dept of Agriculture (Forest Service lands)	N	N/A
Dept of Commerce/National Marine Fisheries (ESA) issues considered	N	N/A
Dept of Interior (ESA) issues considered	N	N/A
IGCE completed, if required	Y	
NPL coordination	N	N/A
ORC coordination/concurrence	Y	
PRP search initiated	Y	
CID coordination	Y	
Admin Record established	Y	
State coordination	Y	
SHPO coordination	N	Categorically Excluded action
Operations/Hanford Office coordination	N	N/A
Tribal Office coordination	N	N/A
Tribal (cultural and natural resources) issues considered	N	N/A

Original to: Records Center (Admin Record)
Copies to: ~~Lynne Kershner~~ (CERCLIS reporting) Doug
Mike Sibley (ERRS)
(~~Is this now Wendy Adams?)Mary Matthews (ER Program file~~)

[1] This check sheet is **required** for all Action Memos and is to be used as a guide for OSCs and RPMs to ensure proper communication and coordination with various stakeholders. With the exception of ORC, formal concurrence is not required but items should be considered prior to routing an Action Memo for signature. Check sheet should be included with formal signature package.